

## REMARKS

In the above-identified Office Action the claims were again rejected as being obvious in view of a combination of the disclosures of the previously cited Seto and Loce patents. In response, however, independent Claims 1 and 6 have been amended and are believed to be patentably distinct over those references for the reasons set forth below.

Specifically, a feature of Applicants' claimed invention is to determine a laser exposure amount, corresponding to a target halftone value in any one of a plurality of halftone dot patterns, such that each density of the plurality of halftone dot patterns is equal in the target halftone value, and wherein each density of the plurality of halftone dot patterns is the same before being resolution-converted and differs from each other after being resolution-converted. This feature is based on Figs. 13 and 14 as described in the Specification. The target halftone value is any one of the values of image data 0, 64, 125, and so on. Moreover, this feature is based on the explanation of Figs. 4 and 6, described in the BACKGROUND OF THE INVENTION, that halftone dot patterns are included in expanded image data.

Referring now to the cited prior art, the Seto patent discloses applying interpolation processing to convert 300 dpi to 600 dpi (col. 12, lines 9-19 and Fig. 7); and converting 300 dpi RGB bit data to 300 dpi YMCK multiple-value bit data, converting the 300 dpi YMCK multiple-value bit data to 600 dpi YMCK multiple-value bit data, and outputting the 600 dpi YMCK multiple-value bit data to an engine (col. 6, lines 45-56).

Further in this regard, the Loce patent discloses outputting an output pattern (e.g. a PWPM code) according to an input image by using a look-up table when the input image is converted to high resolution (resolution enhancement). When the look-up table is

generated, a statistical method is used. Also, Loce discloses that in order to design a filter that achieves the same input/output density relationship, an occurrence threshold is chosen to be one-half of the number of occurrences of an input template when input low-resolution bitmap data is converted to provide an output of high-resolution bitmap data by the filter (col. 12, lines 40-45). In the Loce patent, however, the above-characterized feature of the claimed invention is not disclosed, wherein a determination is made as to a laser exposure amount corresponding to a target halftone value in any one of a plurality of halftone dot patterns, such that each density of the plurality of halftone dot patterns is equal in the target halftone value, and wherein each density of the plurality of halftone dot patterns is the same before being resolution-converted and differs from each other after being resolution-converted.

Loce merely discloses the relationship before and after converting one pattern.

Again in this regard it is seen that in Applicants' claimed invention, a laser exposure amount is determined such that densities of two halftone dot patterns are equal, wherein each density of two halftone dot patterns is the same before conversion and differs from each other after conversion, and wherein the conversion is resolution-converted by anti-aliasing processing.

For the reasons set forth above it is submitted that neither of the Seto and Loce references discloses the invention of Applicants' claims. Accordingly, the issuance of a Notice of Allowance is solicited for this application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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